


AO 91 (Rev. 08/09) Criminal Complaint

**FILED****UNITED STATES DISTRICT COURT**

JAN 21 2025

for the  
Western District of TexasCLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY   
**DEPUTY CLERK**United States of America  
v.  
DIEGO-Avellaneda, Victor Hugo  
11/28/1985

Case No. DR:25-175M-01

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2025-01-19 in the county of Maverick in the  
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18 USC 554

Smuggling of Goods Out of the United States (Firearms)

This criminal complaint is based on these facts:

On January 19, 2025, Customs and Border Protection Officers (CBPO) conducting outbound operations at Eagle Pass International Port of Entry Bridge #1 encountered Lawfully Admitted Resident Victor Hugo DIEGO-Avellaneda as the driver of a red Nissan Frontier Pickup. DIEGO-Avellaneda gave CBPOs a negative declaration for having any weapons, ammunition, currency, or any other contraband or prohibited items. During a search of DIEGO-Avellaneda's vehicle, CBPOs found two large duffel bags containing 40 rifles, 6 shotguns, 1 pistol, 80 magazines, and 2 rifle scopes.

Homeland Security Investigations (HSI) Eagle Pass Special Agents (SA) responded and conducted a post-Miranda interview of DIEGO-Avellaneda. Upon interview, DIEGO-Avellaneda admitted he knew he was smuggling the firearms and magazines to Mexico and was being paid approximately \$100 for each firearm he smuggled to Mexico. DIEGO-Avellaneda further admitted that eleven (11) of the firearms in the weapon load belonged to him. DIEGO-Avellaneda stated he knew it was illegal to smuggle firearms from the United States to Mexico.

The facts of the case were relayed to an Assistant United States Attorney (AUSA) who accepted prosecution of DIEGO-Avellaneda for violation of Title 8 USC 554, Smuggling of Goods from the United States.

☐ Continued on the attached sheet.

Complainant's signature

Ariel Morales HSI Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 01/21/2025

Judge's signature

City and state: Del Rio, TexasUnited States Magistrate Judge Joseph Cordova  
Printed name and title